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**MEMORANDUM ENDORSED**

Hector V. Ramirez, Esq.  
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March 11, 2020

**VIA ECF**

Honorable Judge Gregory H. Woods  
United States District Court  
500 Pearl St., Room 2260  
New York, NY 10007

**Re: Gonzalez v. Canal Loft Hotel, Inc.  
SDNY Case No.: 1:19-cv-04578**

**Request for Extension of Time to File Expert Report  
to Reduce Legal Fees and Conserve Judicial Resources**

Dear Judge Woods:

We represent Plaintiff, Jesus Gonzalez, in the above-captioned case. This is an action for injunctive relief under the Americans with Disabilities Act, and for damages under N.Y. State and City Human rights Laws. Defendant is in default and Plaintiff submitted its proposed Final Judgment. This Court directed Plaintiff to file a supplemental memorandum of law, and expert report, by March 11, 2020.

Plaintiff respectfully requests a sixty (60) day extension of time to file these additional items, and submits good cause exists for the following reasons. First, the injunction sought was for remediation of the Defendant's hotel's website, so that it will comply with accessibility disclosures required by law. A review of the website undertaken by me today confirms that some remediation towards disclosure of accessibility information (as sought in the lawsuit) has been undertaken. It therefore appears likely that Defendant has obtained knowledge of this lawsuit and made corrections, although it has thus far refused to participate in the action.

Second, obtaining the expert report is going to add significant expense to this case, which will make ultimate amicable resolution more difficult. Third, submission of the expert report, entry of final judgment, execution of the final judgment, and all the related filings and hearings will lead to the use of significant judicial resources to enforce/police an injunction.

Prior to proceeding at this time therefore, and especially in light of the fact that Defendant appears to be making changes to the website presumably in reaction to this lawsuit, Plaintiff requests an opportunity to focus resources on contacting and working with Defendant towards a resolution of this claim, without further judicial participation. Plaintiff respectfully asserts that this could result in a resolution of the action with a reduction of legal fees and

conservation of judicial resources. However, to the extent these efforts do not bear fruit, Plaintiff will then renew his application, incur the not-insignificant expert expenses, and file the requested supplemental memorandum of law.

I thank the Court for your time and attention to this matter.

Respectfully Submitted,

**Law Offices of Nolan Klein, P.A.**


By: /s/ Hector V. Ramirez  
HECTOR V. RAMIREZ, ESQ.  
(HR3270)

HVR

Application granted in part. The deadline for Plaintiff to submit the materials called for in the Court's March 11, 2020 order is extended to April 11, 2020. Plaintiff should not expect further extensions of time. Failure to comply may result in the dismissal of this action for failure to prosecute.

SO ORDERED.

Dated: March 11, 2020  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge